

The Chrysler Building 405 Lexington Avenue, NY, NY 10174-1299 Tel: 212.554.7800 Fax: 212.554.7700 www.mosessinger.com

John V. Baranello Direct Dial: 212.554.7863 Fax: 212.377.6064

E-Mail: jbaranello@mosessinger.com

January 23, 2020

Katharine H. Parker United States Magistrate Judge U.S. District Court Southern District of New York 500 Pearl Street, Room 750 New York, NY 10007

Re: Zayas v. 144-146 West 19th Street, Associates, LLC Case # 1:19-cv-10349 (JMF) (KHP)

Dear Magistrate Judge Parker:

We have been retained to represent Go Go Curry America LLC, incorrectly sued herein as Go Go Thai Inc. in the above-referenced action. Counsel for Defendant 144-146 West 19th Street Associates, LLC, with whom I have conferred, joins in this instant letter motion. In accordance with Rule 1(F) of Your Honor's Individual Practices in Civil Cases, I write to respectfully request:

- 1. An extension of the deadline for defendants to answer, move or otherwise respond to the Complaint until February 21, 2020;
- 2. A 30-day extension of the Initial Pretrial Conference, currently scheduled for February 27, 2020; and
- 3. An extension of the mandatory mediation deadline, ordered to take place two weeks before the Initial Pretrial Conference.

This is the first request for an extension of these deadlines, and counsel for Plaintiff consents. Counsel for both defendants have recently been retained and intend to confer amongst themselves and with counsel for Plaintiff concerning a potential resolution of this matter.



January 23, 2020 Page 2

We wish to thank the Court for its courtesies and consideration.

Respectfully submitted,

/s John V. Baranello

John V. Baranello MOSES & SINGER LLP Counsel for Go Go Curry America LLC

- and -

/s John P. Kelly

John P. Kelly WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP Counsel for 144-146 West 19th Street Associates, LLC